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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LV DIAGNOSTICS, LLC, a Nevada limited
liability company,

Plaintiff,

v.

THE HARTFORD FINANCIAL SERVICES
GROUP, INC., a Connecticut corporation;
SENTINEL INSURANCE COMPANY, LTD., a
Connecticut corporation; DOES I through X,
inclusive; and ROE CORPORATIONS I through
X, inclusive,

Defendants.

Case No.: 2:17-cv-01371-JCM-PAL

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES
(SECOND REQUEST)**

Defendants Hartford Financial Services Group, Inc. (**Hartford**), and Sentinel Insurance Company, Ltd. (**Sentinel**) (collectively **Defendants**), and plaintiff LV Diagnostics, LLC (**Plaintiff**), respectfully submit the following stipulation requesting a sixty (60) day extension of the current scheduling order deadlines.

I. INTRODUCTION.

This case is a dispute arising out of an insurance policy covering the building and business personal property at Plaintiff's location at 600 S. Martin Luther King Boulevard, in Las Vegas, NV. Plaintiff allegedly suffered loss as a result of a break-in on April 8, 2015, and made a claim on its insurance policy. Plaintiff filed a complaint in State Court on April 7, 2017, alleging breach of

contract, breach of the covenant of good faith and fair dealing, bad faith, and unfair trade practices. On May 15, 2017, Defendants removed this matter to Federal Court. A discovery plan and scheduling order was entered on July 14, 2017 [ECF Docket #17]. A stipulation and order to extend discovery deadlines was entered on November 14, 2017 [ECF Docket # 23].

II. DISCOVERY STATUS.

On November 14, 2017, the court entered a stipulation and order to extend discovery deadlines which set the following deadlines:

- (a). Discovery Cut Off: Thursday, March 29, 2018.
- (b). Motions to amend pleadings or add parties: Friday, December 29, 2017.
- (c). Initial Expert Disclosures: Monday, January 29, 2018.
- (d). Rebuttal Expert Disclosures: Friday, March 2, 2018.
- (e). Interim Status Report: Monday, January 29, 2018.
- (f). Dispositive Motions: Monday, April 30, 2018.
- (g). Pretrial Order: Tuesday, May 29, 2018.
- (h). Extensions or Modifications of the Discovery Plan and Scheduling Order: Thursday, March 8, 2018.

A. Discovery that has been completed.

- 1. Defendants served their initial disclosures on October 10, 2017.
- 2. Plaintiff served its initial disclosures on October 2, 2017. The certificate of service indicates that they were mailed earlier, but they were not received. After correspondence, they were submitted.
- 3. Defendants served their first set of requests for production of documents and first set of interrogatories to Plaintiff on October 10, 2017.
- 4. Defendants served their first supplement to initial disclosures on October 10, 2017.
- 5. Plaintiff served its supplemental disclosures on November 28, 2017.
- 6. The deposition of Edgar Manukyan occurred on December 8, 2017.

7. Defendants served their second supplement to initial disclosures on December 12, 2017.

B. Discovery that Remains.

1. Expert disclosures;
2. Deposition of Expert Witnesses;
3. Written Discovery;
4. Plaintiff's deposition (and follow up discovery on any new issues that arise at the deposition)

The parties reserve the right to take additional discovery during the time frames outlined below should the need arise.

C. Pending Motions.

There are two motions to dismiss [ECF Docket # 5 & 6] currently pending before the court.

III. REASON WHY EXTENSION IS REQUIRED.

The parties are requesting an additional sixty (60) days of discovery in order for plaintiff to continue to gather necessary documents. The parties are also pursuing a settlement. This request is being made in a timely manner. The parties believe that good cause is demonstrated by the above facts and circumstances.

IV. PROPOSED SCHEDULE.

- (a). Discovery Cut Off: **Tuesday, May 29, 2018 (deadline falls on Memorial Day).**
- (b). Motions to amend pleadings or add parties: **No extension requested.**
- (c). Initial Expert Disclosures: **Friday, March 30, 2018.**
- (d). Rebuttal Expert Disclosures: **Tuesday, May 1, 2018.**
- (e). Interim Status Report: **Friday, March 30, 2018.**
- (f). Dispositive Motions: **Friday, June 29, 2018.**
- (g). Pretrial Order: **Monday, July 30, 2018 (deadline falls on a Saturday).**
- (h). Extensions or Modifications of the Discovery Plan and Scheduling Order: **Monday, May 7, 2018.**

The parties believe that the sixty (60) day extension of the discovery deadlines are necessary and appropriate to provide sufficient time for plaintiff to gather all of its documents, and complete settlement negotiations. The parties believe this demonstrates the required good cause for the extension.

DATED this 8th day of January, 2018.

AKERMAN LLP	ROGER P. CROTEAU & ASSOCIATES, LTD.
<p><u>/s/ William S. Haldas</u> DARREN BRENNER, ESQ. Nevada Bar No. 8276 WILLIAM S. HABDAS, ESQ. Nevada Bar No. 13138 1635 Village Center Circle, Suite 200 Las Vegas, Nevada 89134</p> <p><i>Attorneys for Hartford Financial Services Group, Inc., and Sentinel Insurance Company, Ltd.</i></p>	<p><u>/s/ Roger P. Croteau</u> ROGER P. CROTEAU, ESQ. Nevada Bar No. 4958 ROBERT W. LINDER, ESQ. Nevada Bar No. 3661 9120 W. Post Road, Suite 100 Las Vegas, NV 89148</p> <p><i>Attorneys for LV Diagnostics, LLC</i></p>

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: January 17, 2018